

1 LUCAS VALLEY LAW
MARK K. de LANGIS (SBN 190083)
2 2110 Elderberry Lane
San Rafael, California 94903
3 Telephone: (415) 472-3892
Facsimile: (415) 472-3977
4 mdelangis@lucasvalleylaw.com

5 Attorneys for
AMERICAN PRESIDENT LINES, LTD., AND APL
6 CO. Pte, LTD,

7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10
11 AMERICAN PRESIDENT LINES, LTD., and
APL CO, Pte., LTD,

12 Plaintiff,

13 v.

14 HARTFORD FIRE INSURANCE COMPANY, a
corporation,

15 Defendant.
16

No. C05 4717 MMC

STIPULATED REQUEST FOR ORDER
GRANTING RELIEF FROM CASE
MANAGEMENT SCHEDULE

17
18
19
20
21 ///

22
23
24 ///
25
26

STIPULATED REQUEST FOR RELIEF FROM CASE MANAGEMENT SCHEDULE

1 Pursuant to Civil Local Rules 6-1(b), 6-2(a), 7-11, and 16-2(d) and (e), plaintiffs
2 American President Lines, Ltd. And APL Co. Pte., LTD.(collectively "APL") and defendant
3 Hartford Fire Insurance Company ("Hartford") request an order granting relief from the Case
4 Management Schedule in the above-captioned matter.

5 No previous time modifications to the Case Management Schedule have been
6 requested or granted. The requested enlargement of time/ relief from the Case Management
7 Schedule is sought because Hartford has just recently substituted in Dean P. Sperling as counsel
8 and a conflict has arisen requiring the substitution of new counsel. The substitution of attorney
9 replacing Dean P. Sperling with Sharon Biederman is currently being processed by Hartford and
10 counsel. Ms. Biederman just received the file on Wednesday, February 8, 2006, and is still in the
11 process of substituting in as counsel. Although counsel spoke on February 8, 2006, Ms.
12 Biederman is still in the process of gathering information regarding this file.. (See Declaration of
13 Sharon R. Biederman, filed in support of this Stipulated Request.)
14

15 IT IS HEREBY STIPULATED by and between plaintiffs APL and defendant
16 Hartford that the Case Management Schedule shall be vacated and amended to reflect the
17 following dates;
18

19	Date	Event	Governing Rule
20	3/10/2006	Last day to meet and confer re initial disclosures, early settlement, ADR process selection, and discovery plan	FRCP 26(f) ADR L.R. 3-5
21	3/10/2006	Last day to file Joint ADR Certification with Stipulation to ADR process or Notice of Need for ADR Phone Conference	Civil L.R. 16-8
22	3/24/2006	Last day to complete initial disclosures or state objection in Rule 26(f) Report, file/serve Case Management Statement, and file/serve Rule 26(f) Report	FRCP 26(a)(1) Civil L.R. 16-9
23			
24	3/31/2006	Case Management Conference in Courtroom 7, 19 th Floor, SF at 10:30 a.m.	Civil L.R. 16-10
25			
26			

STIPULATED REQUEST FOR RELIEF FROM CASE MANAGEMENT SCHEDULE (C 05-4717 MMC)

1
2 DATED: February 9, 2006

LUCAS VALLEY LAW

3
4
5 By: s/

6 Mark K. de Langis
7 Attorneys for Plaintiffs
8 Company A

9 DATED: February 9, 2006

LAW OFFICES OF DEAN P. SPERLING

10
11 By: 

12 Dean P. Sperling
13 Attorneys for Defendant
14 Hartford Fire Insurance Company

15 PURSUANT TO STIPULATION, IT IS SO ORDERED

16 Dated: February 13, 2006

17 

18 UNITED STATES DISTRICT JUDGE
19
20
21
22
23
24
25
26

STIPULATED REQUEST FOR RELIEF FROM CASE MANAGEMENT SCHEDULE (C 05-4717 MMC)